

# CLEAN WATER ACTION

July 19, 2005

Sandra Etzel, Chief Engineer  
Air Quality Program  
Allegheny County Health Department  
301 39<sup>th</sup> St., Building #7  
Pittsburgh, PA 15201

Dear Sandra Etzel,

I am writing on behalf of the over 6,000 Clean Water Action members currently residing in Allegheny County, concerning the proposed Title V Operating Permit for the U.S. Steel Clairton Coke Works. We hope that you find our comments on this draft permit helpful in finalizing the permit.

Overall, Clean Water Action would like to suggest a number of changes to the permit that will help deal with two major pollution problems associated with the Clairton Coke Works, the largest plant of its kind on the planet. First, the plant is one of the largest sources in Allegheny County of numerous air toxics, including both volatile organic compounds (VOCs) and hazardous air pollutants (HAPs). EPA's Toxic Release Inventory lists the Clairton Coke Works as emitting over 1.6 million pounds of toxic chemicals every year. Second, the plant is listed in ACHD's Emissions Inventory as one of the top sources in the area of fine particulates (PM2.5). PM2.5 readings in the Mon Valley are among the highest in the U.S., and the Clairton Coke Works is clearly part of the source of this health threatening problem. While these two problems are distinct, there is some overlap, as some of the hazardous pollutants are also precursor pollutants for the PM2.5

**1. ACHD should require better periodic monitoring for every major source in the plant of either VOCs, HAPs, or particulates.**

A number of major sources of VOCs, HAPs, and particulates in the plant either have no testing requirements, or the monitoring is very limited. ACHD should make better monitoring requirements in order to ensure that US Steel is complying with their emission limits. Areas of the plant that could use better monitoring include:

- Batteries – ACHD should make use of video monitoring equipment to better detect problem areas in terms of complying with the many visual emissions requirements.

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- Quench Towers – ACHD currently collects no information on the amount of particulates, HAPs or VOCs coming off of the quenches. ACHD’s technical support document lists the quench towers as a source of considerable particulates (125 tons/year of PM10). ACHD should conduct periodic sampling to determine actual emissions. In addition, there do not appear to be any current requirements for regular testing of the quench water to see that they meet standards listed in the permit (state water quality standards). Given that the reuse of quench water is likely to result in a build up of both solids and various chemicals, regular testing of the actual quench water is critical.
- By-products Plant – The by-products plant is a very large source of VOCs (124 tons/year) and HAPs (30 tons/year). However, it is difficult to judge how effective the required leak detection and repair program is in keeping fugitive emissions within allowed limits. ACHD should establish a fence line monitor around the by-products plant to better determine if emission limits are being met.
- Desulfurization Plant – While the desulfurization plant is well monitored for sulfur compounds and NOx, there is little testing in comparison for VOCs. Given that the incinerator at the plant is an enormous source of VOCs (398 tons/year), it seems vital that testing should be conducted annually, if not more frequently, for VOCs.
- Coal and Coke handling areas – Coal and coke handling areas emit significant amounts of particulates (Peters Creek Coke Screening emits 65 tons/year alone), but there is little testing to see if visible emission requirements are being met. Monitoring could be improved through fence line monitoring, video monitoring, or by inspectors using handheld PM monitors or taking visual opacity readings.

**2. ACHD should test each part of the plant to determine where dangerous fine particulates (PM2.5) are coming from in order to develop a strategy to clean up the plant.**

ACHD is well aware that the Clairton Coke Works plays a large role in the high ambient levels of PM2.5 in the Mon Valley. Yet, the draft permit does not list PM2.5 as a pollutant, it does not identify how much PM2.5 comes from various parts of the plant, nor does it require any testing for PM2.5 from any part of the plant. PM2.5 is currently a regulated pollutant under the Clean Air Act, and both Clairton and Allegheny County have been declared by EPA as being “non-attainment” areas with regards to federal standards for PM2.5. Oddly, ACHD’s Emissions Inventory lists how much PM2.5 is being emitted from the Clairton Coke Works, but this number is absent from the permit.

In addition to the regulatory problem of not including PM2.5 in the permit, ACHD is missing an opportunity to make sure that this permit will help solve the PM2.5 problem for the area. In order to create a plan to reduce PM2.5 from the Clairton Coke Works, ACHD must require monitoring for PM2.5 from each part of the plant that is suspected of being a significant source of this pollutant. This monitoring needs to include testing for both filterable PM2.5 and condensable PM2.5 (i.e. gases that will condense into particulates). We will not be able to solve the PM2.5 problem without this data, and it should be required in the permit.

**3. ACHD should quantify how much of each HAP is being emitted from the plant.**

While a number of HAPs are quantified in the permit (i.e. benzene), a number of highly toxic ones are not. Examples include: mercury, lead, chromium, arsenic, PAHs (polycyclic aromatic

hydrocarbons). Data from ACHD's Liberty monitor indicate that nearby residents could be exposed to significant amounts of these pollutants. Again, ACHD's Emissions Inventory does quantify HAP emissions, but these numbers are not included in the permit. ACHD should quantify how much of each HAP is being emitted, from which part of the plant it is coming from, and the impact these air toxics will have on the surrounding community. ACHD should determine if additional monitoring would be necessary to determine the sources of the various HAPs emitted from the plant.

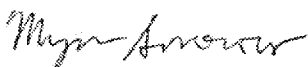
Coke plants were long ago identified as an industry that has the potential to significantly impact the health of both workers and nearby residents. Over 20,000 kids in Allegheny County suffer from asthma, many of whom live in the Mon Valley, an area that in general has both more health problems as well as economic ones.

We want to stress that we make these comments in the hope that it will help ACHD improve the operations of the Clairton Coke Works. We are not interested in seeing the plant shut down, as it is an important source of high paying jobs for Allegheny County. However, we should resist old ways of thinking that equate better environmental performance with fewer jobs. Many jobs at the Clairton Coke Works exist because of environmental regulation, and it is most likely that this plant will only continue to provide jobs locally if it is a good performing plant environmentally. In addition, ACHD should consider that future economic development in the Mon Valley will only happen with cleaner air. Failing to address the problems at the Clairton Coke Works will result in further economic stagnation for the Mon Valley. We are in a situation where residents, businesses, and workers must come together to find solutions to move forward. We hope that our suggestions will help ACHD in doing just that.

Finally, we would like to apologize for the general nature of some of our comments. However, the brief time allowed for the public comment period mandated only an overview of the voluminous permit (200 pages plus). We would again like to state our disappointment at ACHD's refusal to grant a 30 day extension on the comment period, as well as rejecting our request to have the public hearing moved to an area accessible to residents living near the plant. While we understand that ACHD is under political pressure to "get the permits out", that does not mean that this should happen at the expense of public comment, a required part of the Title V program.

Thank you for your time and attention. We look forward to hearing from ACHD regarding our comments. Please contact me in writing at the Pittsburgh office address on our letterhead, or by e-mail at [marnowitt@cleanwater.org](mailto:marnowitt@cleanwater.org).

Sincerely,



Myron Arnowitz  
Western PA Director